Archwilio Cymru
Audit Wales

Information Governance:

Arrangements for Managing Freedom of Information Requests

Conwy County Borough Council

September 2025

About us

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Audit snapshot

What we looked at

1 We reviewed how Conwy County Borough Council manages Freedom of Information (FOI) requests. The audit focused on governance, systems, training, and performance monitoring. We assessed whether the Council meets its legal FOI duties effectively.

Why this is important

2 The Freedom of Information Act 2000 provides public access to information held by public authorities. The Act helps support transparency and accountability in public services. The effective handling of FOI requests ensures timely access to information, builds public trust and helps people make informed decisions.

What we have found

3 The Council has a well-defined strategic framework for information governance, including the management of FOI requests. The Council has recently updated some of its policies information governance policies, including its FOI and Environmental Information Regulations Policy. However, inconsistent reviews of other policies, limited staff training, and the use of two separate logging systems reduce efficiency. FOI performance is below the ICO's 90% benchmark, with only 54% of requests answered within the 20-day deadline in 2024–25. The Council does not publish a disclosure log and lacks benchmarking, which limit its ability to improve performance.

What we recommend

4 We have made three recommendations which relate to assessing systems, improving training, and introducing benchmarking.

Key facts and figures

- **2022–23:**
  1,027 FOI and Environmental Information Regulations (EIR) requests received
  561 (54.62%) responded to within 20 working days

- **2023–24:**
  1,097 FOI and EIR requests received
  540 (49.23%) responded to within 20 working days

- **2024–25:**
  1,193 FOI and EIR requests received
  644 (53.98%) responded to within 20 working days

- **Early 2025–26 (up to 27 May 2025):**
  170 FOI and EIR requests received
  29 (17.06%) responded to within 20 working days

Source: Conwy County Borough Council, Information Governance Unit Annual Report 2024-25.

Our findings

The Council has a well-defined framework for managing FOI requests, but it is not yet delivering timely compliance

5 The Council's governance framework for FOI is well-defined. It has a current FOI & EIR policy (reviewed May 2025 and updated July 2025), an active Publication Scheme, and a clear operating model where a central Information Governance Unit (IGU) works with Information Governance Compliance Officers (IGCOs) in each service to coordinate requests.

6 The Council's Publication Scheme follows ICO guidance and is maintained by the Information Governance Unit (IGU). The Data Protection Policy & Procedures clearly sets out roles and responsibilities, including those of the Senior Information Risk Owner (SIRO), Data Protection Officer (DPO), Service Data Protection Leads, and the Head of IT and Digital Transformation. The policy emphasises a need for all staff to share responsibility for compliance.

7 The Council has mechanisms in place that support transparency in dealing with its FOI requests. The Council has a clear process for how to handle FOI requests that is available to the public online and to staff on the intranet. The process is supported with specific guidance, which contains contact details should someone require further information. The IGU has recently introduced a weekly report for Heads of Service and the IGCOs which highlights overdue FOI requests which improves visibility.

8 However, important weaknesses sit alongside this framework:

- Related information governance policies are on uneven review cycles. For example, the Data Protection Policy was last reviewed in 2021, with a planned review in April 2024 that has not taken place. The Data Incident and Breach Procedure lacks a review date.

- The Council does not publish a disclosure log. While not legally required, the ICO recommends this as good practice for strengthening openness and learning from repeat requests.

9 Despite having a well-defined framework for managing FOI requests, the Council has a track record of missing FOI deadlines. In 2024-25, just over half of the requests met the 20-day statutory deadline. When combined with inconsistent policy reviews, missing these deadlines can increase the risk of non-compliance and expose the Council to complaints. The lack of a disclosure log limits insight into public information needs. This reduces opportunities to learn from trends in requests made and can weaken the Council's commitment to robust information governance and transparency.

The Council uses a central system to record FOI requests, but it does not provide all of the information it requires

10 The Council processes its FOI casework using a central system (Meritec), which is supported by secure shared folders. This provides a platform for handling requests and storing responses. Access to the system is controlled by user permissions and IT protocols.

11 The central system is not a dedicated FOI tool, and it lacks the functionality needed to provide all the management information the IGU needs. As a result, the IGU has to use a bespoke, complex spreadsheet to provide the additional information they require. Currently, just one officer in the Council fully understands this spreadsheet. This reliance upon a complex spreadsheet, that is understood by one individual, creates a single point of failure. This increases the risks of duplication and data errors.

12 The Council's Internal Audit service has highlighted this duplication and suggested formally reviewing the value and suitability of the central system. This formal review has not yet taken place.

13 As well as logging FOI requests on the central Meritec system, the FOI Policy currently allows service areas to also be logged locally. Having the option for both local, service-level, and central FOI request logging can increase the risk of duplication and inaccurate performance data being reported to senior leadership.

14 The Council recognises the limits of its current systems. It appointed an Information Governance Officer in September 2024 to help with workload and improve performance. The Council believes this additional capacity has helped to improve FOI response rates, from 49% in 2023–24 to 54% in 2024–25.

The Council provides targeted FOI training to key officers, but lacks a wider programme to develop operational awareness

15 The Council offers informal FOI training to the team of identified officers who handle requests. It also provides its team one-to-one sessions and group meetings with the Information Governance Manager. The IGU has introduced a business partner model to strengthen links across service areas. The IGU has recently returned to its full complement and is currently exploring what accredited training it need to provide to the new team.

16 There is no structured FOI training programme for the wider workforce. FOI is not covered in induction and there is no system to track FOI-related learning. The mandatory ‘Protecting Information’ e-learning focuses on data protection requirements but does not explicitly cover FOI.

17 The IGU has considered ways to improve awareness, including an FOI e-learning module, toolbox talks, and intranet guidance. However, without broader training and monitoring, there is limited assurance that FOI responsibilities are well understood across the Council. As a result, many staff may not fully understand how to respond to FOI requests, apply exemptions correctly, or meet the statutory 20-day deadline. This knowledge gap could lead to errors, reduced compliance, and a loss of public trust.

The Council monitors FOI performance, but a lack of benchmarking reduces effectiveness

18 The Council monitors and reports on its FOI performance, including the total number of requests, response times and outcomes. The IGU reports this information to the Governance and Audit Committee (annually); the Information Governance Group (quarterly); the IGCO group (quarterly); and to the Senior Leadership Team (quarterly, beginning in August 2025). The IGU shares weekly reports on overdue cases with IGCOs and Heads of Service to improve visibility and accountability. The Council's Senior Leadership Team has recently targeted action to tackle the FOI performance.

19 The Council does not undertake formal benchmarking with other bodies on FOI performance. There is no time-bound improvement plan to raise performance from historic levels (49–54%) toward the ICO's 90% target. The Council does not compare FOI performance across services. Without benchmarking, the Council cannot highlight good practice which limits its ability to target improvement areas and make well-informed strategic decisions.

Recommendations

R1 The Council should assess the value and use of the Meritec system with regards to identified limitations and duplication of effort (in line with the Council's third follow-up review completed by Internal Audit).

R2 The Council should establish formal FOI training for staff who handle requests. It should also provide awareness-raising materials and a simple flowchart explaining the FOI process to all other employees. This will help develop a broader understanding of FOI responsibilities, its importance, and legal requirements across the Council.

R3 The Council should expand its FOI process by adding internal and external benchmarking. Comparing performance across services and with other public bodies will help identify areas for improvement, highlight good practice, and support better decision-making.

Appendices

1 About our work

Scope of the audit

We reviewed the Council's arrangement for managing Freedom of Information (FOI) requests. This included examining policies, procedures, and operational practices to understand how requests are received, processed, and responded to across the organisation.

The audit was conducted remotely. We used document reviews and interviews with key. Interviewees included:

- Head of Audit and Procurement
- Cabinet Member for Audit, Policy and Performance
- Information Governance Manager and Data Protection Officer

Fieldwork took place between June and July 2025, as part of the Council's 2024–25 audit year.

Audit questions and criteria

Questions

We asked: **Does the Council have proper arrangements in place to effectively manage the Freedom of Information requests it receives?**

We also used supplementary questions to explore this in more detail. These were set out in the **project brief** and shaped our audit work.

We assessed performance in four key areas:

- **Governance and Compliance** – Are structures, roles, and responsibilities in place to support FOI compliance?

- **Information Management** – Are systems and processes effective for storing and managing FOI information?
- **Staff Training** – What FOI-related training is provided and how effective is it?
- **Monitoring and Reporting** – How does the Council track FOI performance and share lessons learned?

Criteria

We based our assessment on recognised standards and statutory guidance, including:

- The **Freedom of Information Act 2000** and the **Environmental Information Regulations (EIR) 2004**.
- **ICO guidance**, including the Section 45 Code of Practice and model Publication Scheme.
- **Government publications**, such as Hints for Practitioners Handling FOI and EIR Requests (April 2008).
- **Professional standards** in FOI practice, including expectations around governance, training, and case management.

These sources helped us apply expert judgement and reflect good practice expectations for public bodies.

Methods

We used two methods to gather evidence:

- **Document review** – We examined internal documents, including FOI policies, guidance, performance reports, and training records. These helped us understand the Council's governance arrangements, its operations and compliance.

- **Interviews** – We held structured interviews with staff involved in oversight and management of FOI requests, including senior officers and members of the Information Governance Unit. These discussions helped us understand how policies and procedures work in practice.

Our analysis was qualitative and evaluative. We triangulated evidence from documents and interviews to form our audit findings. The audit was based on available documentation and a limited number of staff interviews.

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